FORM 9 APPLICATION FOR ACCESS TO INFORMATION UNDER PROTECTIVE ORDER BY OUTSIDE OR INSIDE COUNSEL

United States Court of Federal Claims

Space Exploration Technologies Corp.)))
Plaintiff,) No. <u>1:14-cv-00</u> 354-SGB)) Judge <u>Susan G. Braden</u>
v.)
THE UNITED STATES,)
Defendant.)
	SS TO INFORMATION UNDER OUTSIDE OR INSIDE COUNSEL
1. I, K. Alyse Latour , here	by apply for access to protected information covered by
he Protective Order issued in connection with this	with the law firm of Morrison & Foerster, LLP
and have been retained to represent Sproceeding.	Space Exploration Technologies Corp., a party to this
b. I [inside counsel] am in-house cou	nsel (my title is:) fo
, a party	to this proceeding.
3 I am XI am not [] a member of the bar of	the United States Court of Federal Claims (the court).
4. My professional relationship with the party	Irepresent in this proceeding and its personnel is strictly

- one of legal counsel. I am not involved in competitive decision making as discussed in *U.S. Steel Corp. v. United States*, 730 F.2d 1465 (Fed. Cir. 1984), for or on behalf of the party I represent, any entity that is an interested party to this proceeding, or any other firm that might gain a competitive advantage from access to the information disclosed under the Protective Order. I do not provide advice or participate in any decisions of such parties in matters involving similar or corresponding information about a competitor. This means that I do not, for example, provide advice concerning, or participate in decisions about, marketing or advertising strategies, product research and development, product design or competitive structuring and composition of bids, offers, or proposals with respect to which the use of protected information could provide
- 5. I [outside counsel only] identify here (by writing "none" or listing names and relevant circumstances) those attorneys in my firm who, to the best of my knowledge, cannot make the representations set forth in the preceding paragraph:

a competitive advantage.

6. I identify here (by writing "none" or listing names, position, and responsibilities) any member of my immediate family who is an officer or holds a management position with an interested party in the

proceeding or with any other firm that might a disclosed under the Protective Order. None.	gain a competitive advantage from access to the information
7. I identify here (by writing "none" or circumstances) instances in which I have be revoked, or have been found to have violated tribunal: None.	r identifying the name of the forum, case number, date, and een denied admission to a protective order, had admission I a protective order issued by any administrative or judicial
8. I [inside counsel] have attached a de a. my position and responsibiliti in procurement-related matters;	tailed narrative providing the following information: es as in-house counsel, including my role in providing advice
b. the person(s) to whom I repo c. the number of in-house couns in competitive decision making d. my relationship to the neare terms of physical proximity and	rt and their position(s) and responsibilities; sel at the office in which I work and their involvement, if any, and in providing advice in procurement-related matters. st person involved in competitive decision making (both in d corporate structure); and
e measures taken to isolate me	from competitive decision making and to protect against the sted information to persons not admitted under the Protective
9. I have read the Protective Order issue with that order and will abide by its terms and in connection with the proceeding.	ed by the court in this proceeding. I will comply in all respects d conditions in handling any protected information produced terms of the Protective Order may result in the imposition of by the court and in possible civil and criminal liability.
	* * *
By my signature, I certify that, to the (including attached statements) are true and c	best of my knowledge, the representations set forth above correct.
V. Mepey Laforer	May 8, 2014
Signature K. Alyse Latour, Associate Typed Name and Title	Date Executed
Phone: 703-760-7763; Fax: 703-760-7777 Telephone & Facsimile Numbers KLatour@mofo.com	
E-mail Address	Marc 9, 2014
Signature of Attorney of Record	May 8, 2014 Date Executed
Richard J. Vacura, Partner Typed Name and Title Phone: 703-760-7764; Fax: 703-760-7777	
Telephone & Facsimile Numbers RVacura@mofo.com	